

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

-v-

BANK OF NEW YORK, JP MORGAN
CHASE, SOCIETE GENERALE and
CITIBANK,

Defendants.

JPMORGAN CHASE BANK, N.A., and
JPMORGAN CHASE & CO.,

Third-Party Plaintiffs,

-v-

STEVEN M. GREENBAUM, *et al.*

Third-Party Defendants.

(FILED PARTIALLY UNDER SEAL DUE
TO CONFIDENTIAL INFORMATION
SUBJECT TO PROTECTIVE ORDER)

Case No. 09 Civ. 5900 (RPP) (MHD)

**NOTICE OF JUDGMENT CREDITORS'
JOINT MOTION FOR PARTIAL
SUMMARY JUDGMENT
ON CLAIMS FOR TURNOVER OF
[REDACTED] BLOCKED ASSETS**

PLEASE TAKE NOTICE that, UPON THE ACCOMPANYING Memorandum of Law, Local Rule 56.1 Statement of Material Facts, Declaration of Curtis C. Mechling, dated September 12, 2013, plaintiffs Jeremy and Dr. Lucille Levin (together, the "Levins"); third-party defendants and counterclaim plaintiffs Steven M. Greenbaum (on his own behalf and as Administrator of the Estate of Judith (Shoshana) Lillian Greenbaum), Alan D. Hayman, and Shirlee Hayman; Carlos Acosta, Maria Acosta, Tova Ettinger, the Estate of Irving Franklin, the Estate of Irma Franklin, Baruch Kahane, Libby Kahane (on her own behalf and as Administratrix of the Estate of Meir Kahane), Ethel J. Griffin (as Administratrix of the Estate of Binyamin

Kahane), Norman Kahane (on his own behalf and as Executor of the Estate of Sonia Kahane), and Ciporah Kaplan (collectively, the “Greenbaum and Acosta Judgment Creditors”); and third-party defendants and counterclaim plaintiffs the Estate of Michael Heiser, *et al.* (collectively, the “Heiser Judgment Creditors,” and together with the Levins and Greenbaum and Acosta Judgment Creditors, the “LGAH Judgment Creditors”) will move this Court, before the Honorable Robert P. Patterson, Jr. United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, in Courtroom 24A, for an Order granting the LGAH Judgment Creditors’ partial summary judgment and turnover with respect to the [REDACTED] Blocked Assets (as that term is defined in the accompanying motion papers) in the above-captioned action, and granting such other and further relief as this Court deems just and proper.

Dated: September 12, 2013

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/s/ Curtis C. Mechling

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